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Sent: Tuesday, December 21, 2021 2:48 PM
To: Steve Weil <weil@loevy.com>
Cc: Wallis, Ryan C. <rwallis@cassiday.com>; Sarah Grady <sarah@loevy.com>
Subject: RE: L. Reed v. Wexford, et al.: Document production

As a follow up from our call today, you will be producing the medical records you have in this case today. You will review the Complaint to cure any errors through amendment. We specifically discussed paragraphs 28 and 31, which contain allegations against Dr. Shah for when plaintiff was inpatient at the hospital receiving care. We are tabling the discovery disputes until resolution of this issue.

I will supplement the initial disclosures with the IDOC medical records we just received.

Please advise if you have any questions.

Sincerely,

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